

**Washington, D.C. 20554**

MM Docket No. 99-325

### Reply Comments of John Pavlica, Jr.

I, John Pavlica, Jr., hereby submit my Reply to Comments concerning In-Band-On-Channel Digital Audio Broadcasting (IBOC-DAB) in the United States of America AM / Medium Wave broadcasting band, and FM / VHF broadcasting band as well. Based on the Comments and the Reply to Comments that I have reviewed, this “American Consumer” strongly suggests that the Commission take no action to endorse IBOC broadcasting on the AM band or FM band at this time. There should be no rush to force this single technology onto the American Consumer for the following reasons: there were no other commercial alternatives presented here; IBOC would degrade service to many; and there is no overwhelming demand by the American people to change from the current analog broadcasting to a digital broadcasting method. In their Reply to Comments, iBiquity states that there is “widespread industry support for IBOC” but they do not indicate any widespread consumer support or demand. I hope that the Commission will take the consumer into consideration in addition to the corporate financial interests.

## I. Why Only One Option Submitted?

Why is there only one option (iBiquity) being offered during this effort to “improve” radio

reception for consumers? If there were so much demand for digital broadcasting, then there would be three or four companies petitioning the FCC to approve their DAB method? I would also like to see offerings by companies to improve the existing analog AM band that will give consumers the option to improve their reception without adding co-channel interference as well as a reduction in analog quality (5KHz audio limitation). I would like to see unbiased testing done by a third party unrelated to IBOC transmitter manufacturers, broadcasting conglomerates, neither the NRSC nor the NAB. This consumer believes that testing should include analog AM radio improvements offered by the following: the newly-proposed “Omega analog AM-stereo receiver system”, the AM noise blanking technologies offered by Allegro MicroSystems, an updated DSP algorithm with wideband stereo AMAX enhancements from Visteon, as well as a future AMAX chipset in development by a California corporation. Let’s put all of these analog changes on the table with all of the digital offerings, and then decide what, if any changes may be approved.

## **II. Current Proposed IBOC System Will Degrade Service To Many.**

Comments and by replies submitted by Clear Channel Communications, The NRSC, The Virginia Center for The Public Press, and by iBiquity, acknowledge that IBOC AM will cause co-channel interference. CCC requests a reduction in the IBOC power levels because of this digital buzz-saw interference. The digital ‘saddlebags’ sit in the co-channel bandwidth, and will obviously degrade analog reception for many stations – and not just AM, but some close-spaced FM stations as well. Two Chief Engineers of 50KW AM stations have indicated that IBOC-AM at nighttime will be a skywave “trainwreck”. IBOC-FM may very well destroy LPFM services and severely degrade analog FM-SCA services such as reading for the blind. The downfalls of the single IBOC system presented thus far does not exceed any perceived benefits.

### **III. No Rush To Judgment on IBOC**

It is my opinion that there should be no rush to make a judgment on IBOC by the Commission as there was with the ill-fated HDTV system fiasco that has been forced-upon the American Consumer without any demand as such. Consumers are in no hurry to be forced to throw their television sets or radios into the trash in four years when they will be unusable due to corporations (not citizens) urging the FCC into approving incompatible digital systems and forcing the sun-setting of analog broadcasting. Viable, quality analog broadcasting must remain for the security purposes of the United States population as well.

### **IV. Summary**

In summary, I feel the Commission should not approve IBOC-DAB as has been submitted thus far. However, if the Commission is forced by corporate entities to make a premature decision on IBOC-DAB, then the FCC should mandate preferential receiver improvements (NOT necessarily digital) to the AM broadcasting band at this time, just as the FCC gave preferential treatment (stereo) to ONLY the ailing FM band in 1959, and withheld it from the then superior AM band in 1959. Twenty years later the Commission made the mistake of allowing a “marketplace” of four different AM stereo formats for 10 years of confusion. Finally the C-Quam AM Stereo standard was finally mandated by the FCC in 1992, but no single AMS standard frustrated the public and most receiver manufacturers (except Sony - which made several excellent receivers capable of decoding all four AM stereo methods). In short, the FCC must set technical standards, and IF any FM improvements are mandated, then an equal or superior improvement must also be made to the AM band (again not necessarily digital). For example: IF the FCC approves IBOC-FM with substantially reduced digital sidebands and no analog sunset, THEN the FCC should mandate that ALL IBOC-FM receivers must ALSO contain AM stereo (both day

and night) which conforms to meeting or exceeding the Omega Analog AMS system, the AMAX standards, or a new DSP wideband AMS standard yet to be set (plus no sunset date for analog AM). Let's make a good decision that allows the American consumer to continue using their existing receivers for decades, yet offers improvements to those who want it, but without any degradation to the analog content.

Thank you again for allowing me to voice my opinions.

Respectfully submitted,

John Pavlica, Jr.